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July 19, 2019

VIA ECF

The Hon. Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
718-613-2170

Re: Liyou Xing v. Mayflower International Hotel Group Inc. et al.
Case No. 18-cv-06616 (PKC)(LB)

Dear Honorable Judge Bloom:

We have noticed our appearance and been asked by the Defendants in this action to represent them as co-counsel alongside the firm of Kevin Kerveng Tung, P.C. We are writing to seek a brief extension on Defendants' responses to Plaintiff's discovery demands.

When we were first retained by the Defendants, on around July 9, 2019, we reached out to Plaintiff's counsel, Aaron Schweitzer, to seek an extension of time for Defendants to respond to the outstanding discovery demands, which at that time were due on July 12, 2019. In short, we asked for a one-week extension on discovery so that we could get up to speed on the case and assist co-counsel in preparing the discovery responses. Mr. Schweitzer graciously agreed.

Yesterday, we communicated with Mr. Schweitzer seeking an additional extension from July 19, 2019 until July 24, 2019, since we spent much of this past week continuing to review the background of the case, meeting with the client, reviewing the papers which have been filed to date, and assisting co-counsel in addressing Plaintiff's recent supplemental submission. In addition, my colleague who is working with me on this matter is away this weekend and not returning until Tuesday. After some back-and-forth, Mr. Schweitzer denied our request.

We are now seeking the Court's approval to respond to Plaintiff's discovery by Friday, July 26, 2019, an additional week from the date we had agreed to respond. At this juncture of the litigation, this does not seem to impose any burden or cause any prejudice to the Plaintiff. This is our first request for such an extension.



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We appreciate the Court's attention to this matter and apologize for needing to involve the Court in a matter we generally attempt to resolve with opposing counsel. We had no such success this time.

Respectfully,

A handwritten signature in black ink that reads "LaKeisha M.A. Caton". The signature is written in a cursive, flowing style.

LaKeisha M.A. Caton